UNITED STATES DISTRICT COURT SOUTHERN DISTRICT NEW YORK	
ERICA ALMECIGA, Plaintiff,	: Case No. 1:15-cv-04319-JSR
- against -	NOTICE OF MOTION FOR SANCTIONS
CENTER FOR INVESTIGATIVE REPORTING, INC., UNIVISION COMMUNICATIONS, INC., UNIVISION NOTICIAS, BRUCE LIVESEY, JOSIAH HOOPER,	
Defendants.	: : X

PLEASE TAKE NOTICE that upon the accompanying Memorandum in Support of CIR's Motion for Sanctions, dated September 14, 2015; the Declaration of Thomas R. Burke, dated September 13, 2015, and exhibits thereto; the Declaration of Bruce Livesey, dated September 13, 2015; and the Declaration of Josiah Hooper, dated September 13, 2015, defendant Center for Investigative Reporting, Inc. ("CIR"), by its undersigned attorneys, will move this Court on October 7, 2015, at 12:00 noon, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, for an order granting CIR's Motion for Sanctions against Plaintiff and Plaintiff's counsel, and granting such other relief as the Court may deem just and proper.

In accordance with the schedule set by chambers pursuant to Rule 2(b) of the Court's individual practices, opposition papers must be submitted by September 25, 2015.

PLEASE TAKE FURTHER NOTICE that in compliance with Fed. R. Civ. P. 11(c), notice of this Motion was served upon Plaintiff on August 14, 2015.

Dated: September 14, 2015

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By: /s/ Alison Schary
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